

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 20-mj-1016

Andrew Lynch, a/k/a Gregory O'Neil

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

(1) On or about April 29, 2018, in the Western District of New York, and elsewhere, the defendant, ANDREW LYNCH, a/k/a GREGORY O'NEIL, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Section 2251(a);

(2) From about April 29, 2018 until May 28, 2018, in the Western District of New York, and elsewhere, the defendant, ANDREW LYNCH, a/k/a GREGORY O'NEIL, with the intent to injure, harass, and intimidate another person, used facilities of interstate or foreign commerce, including internet websites, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to the victims, all in violation of Title 18, United States Code, Section 2261A(2)(B); and

(3) On or about April 29, 2018, in the Western District of New York, and elsewhere, the defendant, ANDREW LYNCH, a/k/a GREGORY O'NEIL, using any facility and means of interstate and foreign commerce, that is, the internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which any person could be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(b).

This Criminal Complaint is based on these facts:

Continued on the attached sheet.



Randall E. Garver
Complainant's signature

RANDALL E. GARVER
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION
Randall E. Garver
Printed name and title

Sworn to before me and signed in my presence.

Date: March 9, 2020



Jeremiah J. McCarthy
Judge's signature

City and State: Buffalo, New York

HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE
Jeremiah J. McCarthy
Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I. INTRODUCTION

I, Randall E. Garver, after being duly sworn, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and entered on duty in May 2006. I am currently assigned to the Buffalo Field Office and work on cases associated with the Violent Crimes Against Children Program, which targets individuals involved in the online sexual exploitation of children. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography.

2. I make this affidavit in support of a criminal complaint charging ANDREW LYNCH ("LYNCH"), with violations of Title 18 U.S.C. Sections 2251 [Production of Child Pornography], 2261A(2)(B) [Cyberstalking] , and 2422(b) [Attempted Enticement].

3. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, other personnel specially trained in the seizure and analysis of computers and electronic media, and on my experience and training. Because this affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation.

I have set forth only the facts necessary to establish probable cause to believe that LYNCH knowingly violated Title 18, United States Code Sections, 2251, 2261A(2)(B), 2422(b).

II. PROBABLE CAUSE

4. The investigation to date has shown that there is probable cause to believe that LYNCH used a Facebook account “gregory.oneil.752” to engage in sexual conversations and obtain sexually explicit images from multiple victims under the age of 18. LYNCH then used those conversations and images to coerce the victims into sending additional explicit pictures, videos, and engaging in sexual video chats. Engaging in such behavior is commonly referred to as “sextortion” and can escalate to cyberstalking. Here, LYNCH’S conduct also led to the production of child pornography in certain instances. The first victim was a 17-year-old girl from Western New York (Victim 1). Pursuant to her consent, I searched her Facebook account to obtain her conversations with gregory.oneil.752. I then used the content of those conversations to obtain a Federal search warrant for the gregory.oneil.752 Facebook account. Additional victims (Victims 2-5) were identified by the investigation based on information Facebook provided pursuant to the search warrant. Moreover, my analysis of the Facebook search warrant return revealed that this investigation has numerous victims of Cyberstalking and Production of Child Pornography, which the FBI continues to identify.

VICTIM 1

5. On or about May 24, 2018, Cattaraugus County (New York) Sheriff’s Office Deputy Benjamin Shields called me and advised that Victim 1, who he and I previously interviewed on a separate matter, was the victim of a sextortion plot. Deputy Shields and I agreed to meet the following day in Gowanda, near Victim 1’s home.

6. On or about May 25, 2018, I interviewed Victim 1 with Deputy Shields.

Victim 1 said that on or about May 14, 2018, she received a Facebook friend request from gregory.oneil.752, who the investigation has since identified as LYNCH. Victim 1 noticed several common Facebook friends with gregory.oneil.752 and therefore accepted the request. The two conversed for a time over Facebook Messenger and Victim 1 advised "I'll be 18 on Thursday"; LYNCH wrote that he was 18. During the interview, Victim 1 said she sent LYNCH nude images and masturbation videos that she produced at his direction, some of which she produced while 17-years-old (though days from turning 18). After sending some nude images, Victim 1 declined to send more. LYNCH advised Victim 1 if she did not send explicit pictures and videos to him, he would post the prior conversations and images to her Facebook account so that Victim 1's family and friends would see her nude images. Victim 1 said she was scared so she complied with the requests. Victim 1 consented to the FBI searching her Facebook account. The same day, I searched Victim 1's Facebook Messenger conversation with LYNCH, some of which is further described in the following paragraphs.

7. Based on my review of Victim 1's Facebook account, I learned that on or about May 15, 2018, Victim 1 and LYNCH exchanged ages as discussed above, establishing that Victim 1 was 17 and LYNCH 18 years old, respectively. LYNCH sent an image, purportedly of himself, wearing shorts with no shirt on, making a muscle with his arm he held a phone with the other. LYNCH requested a photograph of Victim 1 and she sent a picture of herself wearing a sweatshirt holding a cigarette that showed her nose and mouth. Victim 1 said she looked like a bum and LYNCH wrote that Victim 1 was "still cute...those lips...I love them."

LYNCH then sent a picture of an erect penis with the text, “they would look great around my cock lol.” Victim 1 replied “dude really...,” and LYNCH wrote “yeah...why don’t like?” Victim 1 wrote “I do but I wasn’t expecting that.” LYNCH wrote that Victim 1 was sexy, and when Victim 1 asked why, he replied “pale nice lips pretty eyes slim body...I would so hit it.” LYNCH asked Victim 1 to “send me a picture like I sent you,” to which Victim 1 replied that she may do so once home; LYNCH wrote “I’ll make a video of me if you do...so would you fuck me?” Victim 1 replied “maybe.”

8. On or about May 15, 2018, the conversation continued, when LYNCH asked “so can I get a picture,” and Victim 1 replied “no sorry.” The two then discussed Victim 1 having unprotected sex with an individual. LYNCH posted a screenshot of Facebook profile pictures of Victim 1’s mother, aunt, cousin, and grandmother and wrote, “well do as I ask or I’ll post our conversation to them and your friends...I will post our conversation to them and your friends if you don’t do as I ask.” Victim 1 asked “Y” and LYNCH replied “because I want to see your body...just know if you block me or anything I already have them ready to message.” Victim 1 wrote, “ok well I won’t just don’t do it please...I’ll send the pics just don’t message them.” LYNCH promised he would not send the conversation yet, and Victim 1 asked “and do you do this to all the girls you talk to.” LYNCH wrote that he did not and that there was “something about you...I need to see...I need to cum to you,” and Victim 1 sent a close-up picture of her vagina which was held open by her fingers. LYNCH replied “tits and face,” and Victim 1 sent a picture of her breasts to which LYNCH wrote “with your face.” Victim 1 replied “I can’t do that unless ik [I know] you are not going to show anyone

or msg them to my family." LYNCH assured Victim 1, "I swear if you do as I ask I won't...I'm an asshole but not that big of an asshole." Victim 1 then sent a picture that showed her face and breasts. LYNCH then wrote, "and full body nude pic...hello...you need to answer" before Victim 1 sent a nude picture of her body that exposed her breasts, torso, and pubic region.

9. Victim 1 then asked, "Ok can I be done with pics now please," and LYNCH replied "[n]ow pussy pic...your not done till I cum." Victim 1 wrote, "my family is starting to wonder where I went...and please don't make them," to which LYNCH wrote, "pussy pic now...make sure it has light so I can see it." Victim 1 wrote that several years ago she was the Victim 1 of a rape and advised LYNCH "I feel like I did when it happened," referring to the rape. Victim 1 continued and asked "and can I ask you y you r tormenting me like this," and LYNCH wrote "fucking sexy body...ok now pussy pic." Victim 1 sent a close-up picture of her vagina and asked "can I please be done now"; LYNCH replied "no pussy pic without you spreading." Victim 1 sent another picture of her vagina and asked, "are you almost done"; LYNCH wrote "find something to fuck your pussy with." Victim 1 replied she had nothing but fingers, and LYNCH wrote "find something...and make a video of you fucking yourself...or video chat with me...if you do that we are good for the night...if not I post your pictures."

10. After a delay, the conversation continued on the same day when LYNCH wrote "posting...I guess I'll have to." After attempts to video chat each other, LYNCH wrote

"you are good I didn't post...we will video chat tomorrow night." Victim 1 asked, "and please can you erase our convo and send me a pic after you do that." LYNCH wrote, "ok...after the video chat tomorrow"; Victim 1 protested asking that the pictures and conversation be deleted now, which LYNCH refused. Victim 1 asked why he will not delete the conversation and to which LYNCH replied "to get you to do as I want...because that body is perfect." Victim 1 wrote, "you said you weren't that much of an asshole but you really are...you really are I honestly don't even want to talk to you but if I don't your gonna post." LYNCH replied, "well I'm going to bed anyway so one last pic of you fucking yourself with something." Victim 1 answered "after this you have to delete everything," and LYNCH wrote that he would do so only after their video chat the following night and advised, "do it now...find something"; Victim 1 wrote, "you really know how to make a girl cry" before sending another close picture of her vagina.

11. Victim 1 then sent a screen shot from another Facebook user who warned against the sextortion activities of LYNCH and wrote, "hmmmm should've looked into you more" and LYNCH replied, "you should have lol." Victim 1 wrote, "I'll get your video and I'm done for the night" before sending a picture of her masturbating and sent "you never said how long and that is what you are getting now I am going to bed so good night." LYNCH replied "longer or I post and I want to see your whole body naked at least a minute." Victim 1 said she could only do short videos and LYNCH replied "then make 6 of them." Victim 1 sent two additional masturbation videos and asked if she could go to bed. LYNCH replied "nope video chat be naked and light on." Victim 1 asked "Y can't I go to bed I have

school...and you said tomorrow." LYNCH wrote "I'm horny again so do it again really go to town on your pussy finger deep and try to make yourself cum." Victim 1 replied "I can't make myself cum...", to which LYNCH wrote "just try I'm not asking you to cum I just want you to go hard." Victim 1 asked if it could wait until the morning because she was exhausted and LYNCH wrote "no now." Victim 1 asked "y r you doing this," and LYNCH replied "do it"; Victim 1 again asked "y r you doing this," and LYNCH wrote "do it now or I post." LYNCH wrote that Victim 1 needed to video chat, not send a video; the chat log revealed that the video chat ended at 8:32 pm. Victim 1 wrote, "now delete everything and I want proof."

12. In total, on or about May 15, 2018 (two days prior to Victim 1's 18th birthday), Victim 1 produced and sent at least seven pictures and videos to LYNCH that constituted child pornography.

13. On or about May 16, 2018, Victim 1 asked, "did you delete everything yet," to which LYNCH replied, "nope because round 2 is tonight and you better find something to fuck your pussy with if you don't I will post everything make sure it's big." Victim 1 asked, "Y do you want to do this to me," and LYNCH replied "cuz I can." Victim 1 wrote, "[y]ou'll have to wait till I go to bed to get pics and videos and this is the last time cuz you said you promised that after the video chat you would erase everything...so this is it...last time...and I want proof that you erased everything got it." LYNCH replied "ok but you better find something big to fuck." The two continued with Victim 1 stating that she wanted everything

over because she did not want to deal with LYNCH on her birthday the following day. LYNCH advised she was lucky he is not making her have sexual intercourse with him. Victim 1 wrote that he was lucky because she was considering reporting this to law enforcement. LYNCH eventually wrote that he was too high ("stoned") to communicate with Victim 1 further on this day.

14. On or about May 17, 2018, LYNCH wrote Victim 1 "it's your birthday," to which Victim 1 wrote he would have to wait until she went to bed to communicate. LYNCH wrote, "did you ever find something to fuck?" Victim 1 asked if she could be left alone to do homework, and LYNCH replied "tits and face then yea." LYNCH continued to ask Victim 1 vulgar questions regarding vaginal and oral sex.

15. On or about May 18, 2018, Victim 1 wrote LYNCH that after that night, she was to be finished with his sextortion scheme. He replied, "ok but be prepared to do a lot." LYNCH told Victim 1 "get naked pussy stay naked without spreading." Victim 1 and LYNCH then went on to engage in a role playing sexual chat wherein LYNCH sent a picture of his penis and Victim 1 sent multiple masturbation images and videos. After the conversation, LYNCH again demanded another video. Victim 1 again asked that LYNCH delete her conversation, pictures, and videos if she make another video and stated, "I'm just trying to make sure my family don't see this ok?" LYNCH agreed and the two went back and forth about Victim 1 sending the final video before he erases everything else; Victim 1 demanded the conversation and files be deleted first. Victim 1 did not send the video,

requesting proof before doing so.

16. During the next few days, the two went back and forth, with LYNCH repeatedly requesting nude images and threatening to post the files he already had if Victim 1 failed to produce and send more sexually explicit image and videos.

17. On or about May 28, 2018, Victim 1 called me and advised that LYNCH posted a nude image of her Facebook account. Victim 1 said she removed the image so her Facebook friends, to include family members, would not see it.

VICTIM 2

18. On or about April 29, 2018, LYNCH used the “gregory.oneil.752” Facebook account to send a message to Victim 2. After LYNCH greeted Victim 2, she wrote, “just letting you know im 14,” to which LYNCH replied that he is 16. LYNCH then sent a picture purportedly of himself standing in a mirror with his phone up and no shirt on making a muscle (hereinafter “no shirt/making a muscle”). Victim replied “ohh wow your fine asfff” (as fuck); LYNCH asked “are you a virgin” and Victim 2 stated she was. As the conversation continued, Victim 2 claimed she had engaged in certain sexual acts, to include oral sex. LYNCH asked “ever had your pussy played with” and Victim 2 replied “yes.” LYNCH then sent a picture of an erect penis and asked “do you like my cock.” Victim 2 replied it was big and LYNCH asked for a naked picture. Victim 2 sent a picture of herself facing away from the camera, wearing underwear, and a t-shirt. LYNCH told her “that’s not nude sexy.” Victim 2 then sent a picture of her nude buttocks. Victim 2 wrote, “don’t show anybody

please I got exposed once and it's not happening again." LYNCH replied, "ok so I screen shot all your friends. If you don't do everything I ask I will expose." Victim 2 wrote "I won't do anything if you threatening me"; to which LYNCH replied "well I'm just letting you know if you don't do as I ask I will post. Now tits with face pic...do as I ask and I won't (post)". Victim 2 threatened to expose LYNCH as well since he sent a picture of his penis. LYNCH replied the image was obtained from Google and ordered "tits and face now." Victim 2 sent a picture in which she held her shirt up exposing her breasts with her face in the image. LYNCH then wrote "now pussy" and Victim 2 replied, Omg I can't." LYNCH replied, "do it." Victim 2 then sent a close-up image of her vagina.

19. LYNCH then wrote, "now full body nude...spread your pussy open." Victim 2 replied "but if I do this for you you won't expose," to which LYNCH replied, "I won't. Your help me cum." Victim 2 sent another close-up picture of her vagina. LYNCH replied, "make a video of you playing with it." Victim 2 wrote, "this shit is getting to far and im sorry im not sending anymore. I have a boyfriend and if my mom saw you expose me she would have me grounded." LYNCH replied, "make the video." Victim 2 agreed saying "IM ONLY MAKING THE VIDEO AFTER THAT IM DONE SENDING AND IM NOT TALKING TO YOU AFTER THAT." LYNCH wrote back, "you are done till I tell you." Victim 2 asked several times to be left alone and stated "I dont wanna send anymore after this im already scared enough." LYNCH wrote, "well be totally naked. Show your body and then play with your pussy." Soon thereafter, it appeared that a video, titled "video-1525023646.mp4" was attached to the chat (contents not recovered by the FBI).

20. After the video, Victim 2 wrote, “I did what you asked for now thats it,” to which LYNCH replied “for now.” LYNCH then wrote, “find something to stick into your pussy and take a picture.” Victim 2 replied “I’m 14 and I don’t wanna be pressure.” LYNCH tried to convince Victim 2 to masturbate on a video chat which she refused; LYNCH re-sent the picture of Victim 2 exposing her breasts and stated that would be his first post to her family and friends. LYNCH then sent Victim 2 a screenshot showing he was in Facebook Messenger communication with Victim 2’s boyfriend and asked Victim 2 “should I.” LYNCH sent Victim 2 a screenshot showing that he attached the picture of Victim 2’s breasts (with her face) and bare buttocks to her boyfriend’s Messenger session. From the Facebook return it appears as though LYNCH sent two close-up pictures of Victim 2’s vagina, buttocks, and breasts to the boyfriend.

21. On or about June 27, 2018, the FBI located and interviewed Victim 2, a 14-year-old resident of western New York, who recalled receiving a friend request from “Gregory O’Neil” in May 2018. Victim 2 said she took pictures of her breasts, buttocks, and vagina at LYNCH’s direction. She said she did so under duress fearing that her failure to do so would result in LYNCH disseminating her conversations and images to her family members over Facebook. Victim 2 positively identified her Facebook account and validated the specific conversations and pictures discussed herein. Victim 2 advised that she never video chatted with LYNCH and never spoke to him over a voice call. Victim 2 said she was exceptionally scared about the sextortion plot, informed her mother, and then blocked LYNCH’s gregory.oneil.752 account. Victim 2 showed the FBI her portion of the conversation, which

matched what was recovered from the Facebook search warrant return.

VICTIM 3

22. On or about April 30, 2018, LYNCH, using the Facebook account "gregory.oneil.752," wrote to Victim 3 and stated that he added her as a Facebook friend because he thought she was cute. On May 2, 2018, LYNCH sent the no shirt/making a muscle picture to Victim 3, and the two began to converse. Victim 3 stated that she was 16 going on 17. LYNCH asked Victim 3 if she liked his body and she resisted stating that it was not right for her to comment on it. LYNCH then sent a picture of an erect penis, which made Victim 3 upset because she has a boyfriend and "...and no offense body isn't everything it's the personality and heart." Victim 3 admonished LYNCH for sending the penis picture. LYNCH then asked if Victim 3 was a virgin, but she refused to answer: "it's non of your bis." LYNCH replied, "well you do as I ask or should I post our conversation...topless picture of you." Victim 3 was confused and replied, "?...what?...I'm so confused." LYNCH replied, "I'll post our conversation to all your friends unless you do as I ask." Victim 3 asked, "why?" and LYNCH stated, "because I can." Victim 3 wrote, "there is nothing wrong with this convo [you] sent pics...I can get you in jail." LYNCH again stated, "because you won't do as I ask." Victim 3 replied, "I have a BOYFRIEND...you do this to every girl?" LYNCH wrote back, "Idc and no."

23. Victim 3 informed LYNCH that she did not do anything wrong and did not send pictures, stating "its black mail your the disgusting pig." The two discussed a voice call over Facebook Messenger and it appeared there were two video chat calls in a row (content

not recovered). Following the calls, Victim 3 asked if LYNCH would delete what he has and was assured he would. LYNCH advised he deleted everything but wanted to keep one thing for himself. Victim 3 objected and LYNCH claimed he would crop her face out of the image.

24. On or about May 3, 2018, it appeared from the chat that the two had another video chat session (content not recovered), and later LYNCH asked for a picture. Victim 3 said she was up late because of her depression, and wrote that she does not send pictures. LYNCH then sent a screen shot of Victim 3's video chat that showed her wearing underwear with her breasts and face exposed and wrote "luck I do/now do it." After no reply from Victim 3, LYNCH wrote, "you will be mine" and sent a screen shot from the video chat of Victim 3's vagina and wrote, "I have that too/you going to do everything I want...I want a topless picture with your face before you go to school/or you know what happens if you don't. I want a full body nude too".

25. Victim 3 wrote back that she was in the hospital and did not know when she would be released. Victim 3 sent two pictures of an arm and a leg (purported to be hers) that were cut up and stated that she was being admitted to the hospital. Victim 3 wrote, "Just please don't do this again I'm hating my self and wanting to ruin myself for good I got to go to jones hill," which I know to be a hospital in Jamestown, New York. Victim 3 added, "I'm sorry I destroyed my body I never liked it anyways sad I failed but glad its ruined so everyone will love the real me." LYNCH then sent two screen shots from a video chat that showed Victim 3 in underwear with her breasts and face exposed. He wrote "when you get home

from school video chat/you are going to do as I want/I will release the video of you playing with your pussy unless you do as I ask/you will be mine.” LYNCH attached three screen shots of Victim 3’s Facebook friends. Victim 3 sent a picture of herself in a hospital gown and stated that she has to block LYNCH on Facebook so she does not get in trouble (with hospital staff).

26. On June 28, 2018, a colleague and I interviewed Victim 3, a 16-year-old resident of western New York. Victim 3 recalled that in early May 2018, she received a Facebook friend request from “Gregory O’Neil” and said she accepted it. Victim 3 viewed the printed copy of her conversation with LYNCH and recognized it; she said she was a participant in the conversation. Victim 3 viewed the pictures sent by LYNCH and immediately recalled receiving them. Victim 3 recalled that she took part several sexual video chats where she exposed her breasts and vagina at LYNCH’s direction. Victim 3 said she feared her failure to engage in these video chat sessions would result in LYNCH sending the contents of her communications to her family, as he threatened to do. Victim 3 recalled that during voice calls and video chats, LYNCH threatened that he knew where Victim 3 resided and threatened to hurt her family members should she not do as he directed. Victim 3 never saw LYNCH during the video chats (his camera was not on). Victim 3 viewed the screen shots sent by LYNCH that were discussed above, to include the close up of her vagina, and confirmed they were from her video chat sessions with LYNCH.

27. Victim 3, who is diagnosed with depression, wanted the sextortion to end and

obtained images of a cut up leg and an arm from Google. She represented the images to be her. Victim 3 said the sextortion left her “very disturbed” and “very upset.” She mentioned being “highly uncomfortable, like nails going into my skin.” Victim 3 added “made me almost want to die.” Victim 3’s mother told me that Victim 3 was diagnosed with depression and takes medication for the condition. Victim 3’s mother recalled Victim 3 remaining locked in her room for days during this incident and thereafter. Victim 3 told her mother that she “doesn’t want to be here” and “there’s nothing to live for.” She recalled Victim 3 attempting suicide by overdosing on pills following the incident; she was sure this sextortion was a catalyst for the suicide attempt.

28. Victim 3 showed me screen shots she took of her conversation with LYNCH, and I observed them to be exact matches of portions of the Facebook search warrant return.

VICTIM 4

29. On or about May 3, 2018, Victim 4 wrote to LYNCH, “hey, do I know you?” to which LYNCH replied, “no I just added you because you are very sexy.” Victim 4 stated that she was “16 almost 17.” LYNCH then asked Victim 4 if she was a virgin and she replied, “haha no”. LYNCH next asked, “ever let a guy cum inside you,” and she again replied “ha no.” LYNCH sent the no shirt/making muscle picture and asked if Victim 4. Victim 4 complimented the body in the picture sent and they conversed about their day. LYNCH wrote that she would feel better to discuss what was going on. Victim 4 confided “what’s there to say. Beside I wanna die. I don’t see my dad people hate me I’m a slut I’m a worthless disappointment so on.” LYNCH complimented Victim 4 and she then confided in LYNCH

the number of boys she had sex with. The conversation then turned sexual.

30. On or about May 4, 2018, the conversation continued when LYNCH sent the picture of an erect penis held over a toilet that was sent to other victims. LYNCH asked Victim 4 for a picture, and she resisted stating she was once blackmailed having done so. LYNCH wrote, "I'll make a video of me playing with my cock if you do...I'm not going to black mail you I just want to cum to you." Victim 4 stated that the most she ever sent was an image in her bra and underwear; LYNCH stated "I just want to see your boobs that's all." Victim 4 wrote that if LYNCH can "turn her on" with just text, she would agree to a "bra and pantie pic." After several sexual texts, Victim 4 sent an image of herself in a bra and panties with no face in the image. LYNCH then asked to see her bare breasts and Victim 4 refused to send an additional image. LYNCH then sent a screen shot of Victim 4's Facebook friends, which included family members. LYNCH wrote, "Then let's see what they all think about our conversation/unless you do as I ask. I screen shot our conversation and I have them up on messenger. Do as I ask or I post to them...show me your tits or I post."

31. When Victim 4 asked how she would know her conversations and picture were deleted, LYNCH replied, "because I'm an asshole but I'm not going to fuck your life up if you help me cum." Victim 4 continued to protest and resist; she asked if this could be done on Facetime and not with pictures. Victim 4 eventually wrote, "Literally I have been going through hell lately and I thought you were a nice guy." LYNCH wrote, "I'm done talking are you going to do it or not" before asking Victim 4 if her pubic hair was shaved. Victim 4

sent a picture of herself wearing shorts, her breasts exposed, and her face again blocked in the image. LYNCH wrote, "tho are so amazing/now do it again nude." Victim 4 asked "can this plz be the last one" and sent an image of herself naked with her face again blocked. LYNCH replied, "let me see your pussy" and Victim 4 sent a close-up picture of her vagina. LYNCH then wrote "spread it," and Victim 4 sent another close-up picture with her fingers holding her vagina open. LYNCH wrote, "wider/I want to see the hole my dick goes in." Victim 4 complied and sent another close-up image of her vaginal opening. LYNCH then asked for "now nude with face," and Victim 4 replied, "just saying if I keep crying like this I could die because I have a heart problem and crying so much causes my heart to go really fast and with the problem I have I could die from it." LYNCH replied, "take the picture/then we can video chat and I can watch you play with your pussy." Victim 4's mother appeared to take her device and wrote, "this is her mother if I see these pics anywhere I will have your ass arrested." LYNCH replied, "Lmao everyone will see bye."

32. On or about June 26, 2018, a colleague and I interviewed Victim 4, a 17-year-old girl of western New York. Victim 4 recalled that on May 3, 2018, she accepted LYNCH's friend request and communicated with him over Messenger about sexual topics. She told me that LYNCH soon threatened to disseminate portions of their conversation to her family members if she did not send him nude images. When LYNCH sent the screen shot of her Facebook friends, Victim 4 understood that as a threat of dissemination of her images. Victim 4 said the images she sent were created at LYNCH's direction and recalled taking pictures of both her breasts and vagina. Victim 4's mother recalled sitting downstairs in the home when

Victim 4 ran down stairs and was in tears as a result of these communications. She said Victim 4 was crying so hard she could not speak clearly. Victim 4's mother then sent the text to LYNCH as stated above.

VICTIM 5

33. On or about April 29, 2018, LYNCH, using the Facebook account "gregory.oneil.753" sent a message to Victim 5 saying "hey sexy." Victim 5 advised that she was 14-years-old. LYNCH sent a picture of a man with no shirt on to Victim 5 and asked "do you like." LYNCH then asked, "can I ask you a personal question/are you a virgin." Victim 5 replied that she was not and when asked by LYNCH about protection, she replied that she did not use a condom when she previously had sex. LYNCH sent a picture of an erect penis and asked, "do you like my cock" and then asked for a picture of Victim 5. Victim 5 sent a face picture and LYNCH asked "can I see your tits" and was told no. LYNCH sent a screen shot of the Facebook profile of a family member (possibly her father) and wrote, "ok I'll post our conversation to him if you don't". Victim 5 replied "fine but nothing else OK and I'm 13." LYNCH told her to ensure her face is in the picture, which she refused. LYNCH replied "ok posting". Victim 5 wrote "please don't" to which LYNCH told her "[then] face and tits"; Victim 5 sent a picture with her hair in her face and a breast exposed. LYNCH wrote back "both tits/take the shirt off too," and Victim 5 sent another with her shirt pulled up high on her chest with both breasts exposed.

34. LYNCH then wrote "ok now that I have that show your pussy"; Victim 5 stated she cannot because her little brothers are around. LYNCH wrote "now/you can/one picture

of your pussy now and then more later." Victim 5 replied "u said u would leave me alone" to which LYNCH wrote "I lied. I wanted a picture to send if you didn't do everything I asked." LYNCH asked if Victim 5 was shaved and Victim 5 replied, "don't ever text me after this or my family again," and LYNCH wrote "well you going to do a few things before we are done". Victim 5 stated that she could not do videos, to which and LYNCH wrote "pussy pic now".

35. Victim 5 wrote that this was "phone rape," to which LYNCH wrote back that he did not care. Victim 5 sent a picture of her vagina exposed by moving her underwear to the side. LYNCH next told her "take your bottoms off and spread your pussy open"; Victim 5 protested and LYNCH wrote "listen do everything I and I leave you alone/now spread your pussy." Victim 5 sent another picture of her vagina being spread open by her fingers. Victim 5 wrote "I have never had sex before and I have a bf and I'm 13 please leave me alone." LYNCH replied "no now full nude pic/take all your clothes off/I want to see that body naked/then a close up of your pussy spread open." After some discussion wherein Victim 5 wrote that she had time constraints because she had to call her grandmother, LYNCH wrote, "tits now" and Victim 5 sent a picture of her breasts. She explained that she cannot show her face right now and LYNCH told her "ok pussy but a close up." Victim 5 protested that she cannot do a "full body" because she may get caught. LYNCH told her, "ok close up of your pussy, to which Victim 5 asked "ok then can I stop with the pics." LYNCH replied "not till I am done/with you." Victim 5 sent a close-up image of her vagina and advised she could not video chat because she would get caught; LYNCH told her to spread her vagina. Victim

5 sent another picture of her vagina being spread out by her fingers, and LYNCH then directed “closer.”

36. Based on the chat log, it appears Victim 5 sent a video titled, “video-1525028968.mp4.” to LYNCH, who then told her “show me your clit.” Victim 5 asked, “is that the top?” LYNCH replied “yes the thing you were rubbing”; Victim 5 sent another close-up picture of her vagina. LYNCH wrote “no/hang on I’ll show you/find something to stick inside your pussy/and take a picture of it in you.” Victim 5 sent a picture of her vagina with a marker in it. LYNCH stated “make a video of you going in and out,” and Victim 5 sent a video titled, “video-1525029248.mp4”. LYNCH asked “are you wet,” and then he sent a picture of a vagina pulled open so the clitoris is exposed. He then wrote, “that’s your clit show me that.” Victim 5 sent another close-up of her vagina and wrote “that’s the best I can do” and then sent another video titled, “video-1525029487.mp4.” It appears from the log the video was sexual because LYNCH wrote in response, “omg/ok find something bigger to put inside.” Victim 5 said she could not.

37. LYNCH advised she could be done after two more videos if she showed her face in one. Victim 5 stated one more video and refused to show her face. LYNCH replied “you can or I post.” Victim 5 then sent a video titled, “video-1525029665.mp4.” LYNCH was unsatisfied with the length of the video and told Victim 5 to video chat him. Victim 5 again stated that she had to help a family member and had to leave. LYNCH again threatened to post her images and Victim 5 sent a video titled “video-1525029890.mp4.” LYNCH again

protested “no video chat,” and Victim 5 said she had to leave. LYNCH advised “ok after video chat” and Victim 5 wrote “then don’t text me ok.” Victim 5 stated she had time to video chat and LYNCH told her to “get a brush to fuck,” and when she was confused told her “a brush handle.” Victim 5 stated she previously lied about being 14 and that she was actually 13. LYNCH stated “hot. I might have to come fuck you”. From the chat log it shows that the two engaged in a video chat session (no contents recovered).

38. On or about April 30, 2018, the conversation continued, and LYNCH offered to make this stop forever, but Victim 5 stated she got in trouble for being on her phone when she should not be. The following day, May 1, 2018, LYNCH stated a name to whom he was going to post her images and sent her a picture of Victim 5 exposing her breasts. Victim 5 promised to video chat with LYNCH when she got home from school. LYNCH stated, “you better” and told her if she wanted this to stop she would have to “have sex with me.”

39. On or about May 2, 2018, the conversation continued when Victim 5 told LYNCH that he could not text her during the day, from 5:00 am until 9:00 pm because of school, and she asked that he delete what he had. LYNCH replied “pussy pic” to which Victim 5 asked, “but first are u fine about what I told u?” LYNCH wrote “sure,” and Victim 5 advised that after the video chat she would have to go to bed. LYNCH told her “ok make a video that is a minute long of you playing with your pussy.” Victim 5 sent “video-1525221951.mp4,” to which LYNCH replied “it’s not a minute long.” Victim 5 advised she could not make videos that long on her phone. LYNCH told her to make three videos then,

“one fucking the brush.” Victim 5 then sent three videos in a row, none of which were recovered by the FBI.

40. Victim 5 then wrote “bye/that’s what I wanted to say good bye and to be left alone.” LYNCH told her “video chat tomorrow and we will be done.” Victim 5 advised what time she would be available. He also told her “...but I think I want to have sex with you,” and Victim 5 replied “ummm no I’m waiting till I’m over 18 and gn (goodnight).” LYNCH wrote, “well idk/if you don’t I’ll post everything.” He continued, “yo idc about the time I’m horny now.”

41. On or about May 3, 2018, the conversation continued when LYNCH replied, “wow posting,” and Victim 5 wrote, “I can’t talk I can when I get home I [swear].” LYNCH told her “you fucking better/I’m going to want a lot today/I want you to stick something bigger then the brush/inside that pussy/if you don’t I’m posting/go to the bathroom and take a few pictures of your pussy/idc if you’re at school.” Victim 5 wrote that she would do a long video chat that evening.

42. On May 4, 2018, the conversation continued when LYNCH told her, “well I want a pussy pic and a tits and face pic/now.” Victim 5 sent a picture of her breasts and vagina and another of her vagina. LYNCH told her “spread your pussy wider,” and Victim 5 sent a picture of her face; LYNCH directed “with tits.” Victim 5 then sent a picture of her vagina being opened up with her fingers and another of her breasts with her face in the image.

Victim 5 advised that she had to leave, and LYNCH told her to put something inside her; Victim 5 wrote that all she had was the brush and he replied "ok in your ass." Victim 5 refused to do so telling LYNCH that she has never done that before and that she had a physical that day and would be sent to the emergency room. LYNCH wrote "fine," and Victim 5 wrote, "so u want a vid of front" and he replied "yeah but go deep and fast." Victim 5 sent a video titled "video-1525392555.mp4" and another titled "video-1525392569.mp4." Victim 5 wrote that "I gtg," and LYNCH stated "close up picture of your pussy," which she sent. LYNCH then wrote "closer." Victim 5 complied again and sent a closer-framed picture of her vagina. LYNCH told Victim 5 "video chat now," but she said she could not because she was outside getting into a car and said she is not allowed on her phone anymore. LYNCH wrote, "long video chat tonight/your going to put the brush in your ass while you play with your pussy/you better video chat tonight."

43. On May 5, 2018, the chat continued and LYNCH told Victim 5 "full body nude pic," which she sent. LYNCH then directed Victim 5 to "spread your pussy." She then sent two additional pictures of her vagina as directed. LYNCH then wrote "ok fuck the brush." Victim 5 sent a video titled "video-1525484941.mp4," to which LYNCH replied, "rub your clit in the next video." Victim 5 replied, "I can't fuck the brush at the same time then," to which LYNCH replied "I know just rub it/you don't have to fuck the brush." Victim 5 sent a video titled "video-1525485068.mp4." LYNCH wrote, "close up picture of your clit," which she sent as directed. LYNCH next told Victim 5 to "[now] put the brush in your ass then play with your pussy." Victim 5 told him she was "not doing anything with my ass" and

that she “[has] her physical Monday.” LYNCH wrote “do it,” to which she replied “I can’t” and he stated, “then video chat.” Victim 5 stated she is not allowed to do so after 7:00 pm, to which LYNCH wrote “idc video chat and play with that pussy and show that body or I post.” Victim 5 wrote “omg I hate u,” and then the two engaged in a video chat session. Following the session, LYNCH wrote, “nigh and you can block me/we are done for good ok.”

44. On or about May 6, 2018, LYNCH again contacted Victim 5 and wrote “I’m horny/tits and face,” which she sent as directed. He then wrote “now pussy,” which she also sent as directed. LYNCH next wrote “now let me see your asshole,” which she complied with by sending an image of her vagina and anus. He next wrote “spread the pussy wide open,” which she again sent as directed. LYNCH next wrote “now stick the brush in your ass,” to which Victim 5 refused “I can’t not in my ass only my pussy.” He replied “do it now,” to which Victim 5 again mentioned her physical coming up. He replied “fine let’s see what your bf thinks of your nudes.” Victim 5 then wrote that she can do a smaller brush but not her bigger one. She next sent a picture of a pink brush handle inserted into her anus. LYNCH directed her to make a video of her putting the brush in and out of her rectum while putting the larger brush into her vagina. Victim 5 said she cannot do two brushes and hold the phone. LYNCH told her to put them in deep then she can; Victim 5 offered “I can put my razor up my ass and fuck the brush.” Victim 5 sent a video (not recovered by the FBI) and was then advised to make three similar ones and to video chat. LYNCH told her to make sure one of the videos is of her using the brush on her rectum. Victim 5 advised that she sent

the video, and when LYNCH did not seem to obtain it, she wondered if “it won’t send BC it shows private part.” She offered to video chat later in the week (because she stated she was on her period). LYNCH ordered her “no now/get naked and ready to fuck your ass and pussy.” Victim 5 replied “Y are u doing [this] don’t u have anything else to do,” to which LYNCH replied “no but cum to your nice 13 year old body.” From the chat log, it appeared that the two did video chat (the log reads, “you and [Victim 5’s first name] can now see each other”); LYNCH gave Victim 5 directions: “ass,” “deep,” “in your [ass].”

45. On or about May 8, 2018, LYNCH wrote Victim 5 “tonight/ I love your young pussy/I want to see that young pussy.” Victim 5 replied “I can’t talk [right now].” On May 9, 2018, LYNCH replied “posting/all the videos/you fucked up.” He then sent a picture of Victim 5 holding her shirt up exposing her breasts with her face visible and wrote “yup posting/I give you a chance” before sending a screen shot of Victim 5’s Facebook friend’s profile page. The Facebook friend appears to be a family member (same last name) and Victim 5 told him, “I can’t answer in the morning” before promising to video chat later. LYNCH told her “go to the bathroom and send me a pussy pic or I post.”

46. On May 10, 2018, LYNCH wrote, “yo/I’m going to post/ok [Victim 5’s first name] you think I’m joking/I’m going to post.” On May 11, 2018, Victim 5 plead with LYNCH not to post any of her pictures or other materials, and she again promised to video chat that evening. LYNCH told her, “I want you to fuck something big tonight” and after no response began to again threaten to post.

47. On or about May 12, 2018, Victim 5 wrote to LYNCH stating “what the fuck I haven’t been on my phone and I will video chat later BC I’m [sick] and I have been sick all week and I have been sleeping.” LYNCH replied “pussy pic now/I’m horny now.” Victim 5 sent a picture of her vagina. LYNCH replied “tits and face,” and Victim 5 complied. When told to take her shirt off, Victim 5 refused to do so and LYNCH told her “I want to see your butthole.” Victim 5 wrote, “[n]o on more pic and I’m leaving.” LYNCH told her “now,” and Victim 5 sent a picture of her vagina and anus. LYNCH then wrote “no shirt now,” and Victim 5 sent a picture of her shirt pulled up exposing her breasts. LYNCH then wrote “make a video of you pulling your tampon out, and Victim 5 refused stating “no im not doing that rn BC thats gross.” LYNCH replied “well spread your pussy open then.” Victim 5 next sent a picture of her vagina with her fingers holding it open.

48. LYNCH then told her “ok next video chat I want to hear you say, I want you to cum in my 13 year old as you play with it ok.” Victim 5 asked to be left alone while she was sick, to which LYNCH replied, “pull on one of your nipples pic.” Victim 5 wrote, “no I’m leaving,” and LYNCH replied “now.” Victim 5 wrote “fine then don’t text (after the picture).” Victim 5 sent a picture of her pulling on her nipple. LYNCH then wrote “now say you are my whore,” and Victim 5 complied stating, “I’m ur whore.” LYNCH then asked, “do you want my cock to [fill] your pussy” and Victim 5 wrote “no I don’t.” LYNCH wrote, “tell me that you want your young pussy fill with my nut/you are my whore and do as I say.” LYNCH told Victim 5 “I want you to have sex with someone and take pictures of it/and videos/you have till Sunday/if you don’t/I will post.” The conduct continued in a similar

fashion over the next few days before Victim 5 advised on May 14, 2018, that a police officer was going to search her phone; on May 16, she advised that she was grounded for two weeks and would not have her phone.

49. On May 17, 2018, LYNCH wrote “if I don’t get any today I’ll post my slut.” Over the course of several days, Victim 5 continued to send pictures of her vagina at LYNCH’s direction. On May 23, 2018, LYNCH told Victim 5 to “go to the bathroom and take a picture of your pussy.” Minutes later, with no response, LYNCH wrote, “Do it I’m not playing games anymore/I have enough of you to ruin your life. You are mine/Fine/I guess I’ll have to remind you” and sent a picture of an open chat session with Victim 5’s father wherein LYNCH wrote, “hi.”

50. On June 27, 2018, the FBI interviewed Victim 5, a 13-year-old female resident of Western New York, at her residence in the presence of her grandmother. During the interview, Victim 5 confirmed that she was approached by LYNCH over Facebook Messenger, recognized the images sent by LYNCH, and confirmed she was a participant in the conversation. She told the FBI that LYNCH asked her for pictures of her breasts and vagina. When asked if she sent those type of images, Victim 5’s grandmother became upset, and Victim 5 departed the interview.

51. On July 2, 2018, the FBI again interviewed Victim 5 who reviewed the chat log between herself and LYNCH and said she was a participant in the chat and verified the

account as her own. Victim 5 recalled LYNCH initiated contact over Facebook Messenger, and she recognized a mutual friend. Victim 5 said LYNCH quickly sent her a penis picture and began to ask her for pictures of her face and breasts, which she did. LYNCH then asked Victim to produce images of her vagina and send them to him; Victim 5 said she initially resisted the request because she was not comfortable. LYNCH pressured Victim 5 by threatening to send the chat transcripts and pictures her father if she did not comply.

52. Victim 5 knew LYNCH was willing and capable to send the chats and pictures to Victim 5's father because he sent Victim 5 an image of her father's Facebook profile page. Because she feared LYNCH would send the chats and pictures to her father, Victim 5 continued to comply with all his requests. Victim 5 called the scheme a "blackmail" and said she produced new images, videos to include masturbation videos, under duress. Victim 5 said she complied exactly as directed by LYNCH; she explained the content of the videos would be exactly what was requested by LYNCH. Victim 5 further recalled being coerced into participating in sexual video chats with LYNCH. Victim 5 said that during these video chats, LYNCH ordered her to display her vagina in various ways; Victim 5 said she did exactly what LYNCH told her to do. Victim 5 said the incident caused her emotional distress and she is still having trouble sleeping.

FEDERAL SUBPOENAS

53. On May 25, 2018, the FBI served an administrative subpoena to Facebook requesting subscriber information of gregory.oneil.752. On May 26, 2018, Facebook advised that the account gregory.oneil.752 was created on April 29, 2018 from IP address 72.184.105.221 ("target IP address"), which is registered to Spectrum/Time Warner Cable (TWC). Facebook also provided that telephone number (352) 350-5064 was associated with the account and noted that it was "verified," meaning they have communicated with the user over it. Facebook also advised that the email account runcool@mail.com was listed by the user when initiating the account.

54. On May 28, 2018, the FBI served an administrative subpoena to TWC requesting the registrant of the target IP address on April 29, 2018. On May 29, 2018, TWC informed the FBI that the IP address was registered to John Caro, address 6232 West La Prima Court, Crystal River, Florida 34429.

55. On May 29, 2018, the FBI also served an administrative subpoena to Talk Tone requesting subscriber data associated with telephone number (352) 350-5064. On May 30, 2018, Talk Tone informed the FBI that telephone number (352) 350-5064 was registered with display name "Andrew Lynch" and the email address lynn21@mail.com.

56. In response to administrative subpoenas issued by the FBI, 1&1 legal advised that email addresses lynn21@mail.com and runcool@mail.com were both subscribed to by

“Josh Lynn” with different dates of birth. Email address lynn21@mail.com was created on April 11, 2018, and runcool@mail.com was created on April 29, 2018. Of note, both email accounts showed logins from the target IP address.

57. Additional investigation into address 6232 West La Prima Court, Crystal River, Florida 34429 showed that it is a mobile home, and John Caro is listed as a former resident at the address. Located just across the street from the mobile home is 6231 West La Prima Court. Florida Department of Motor Vehicles records show that at least two individuals list 6231 West La Prima Court as their address: John Caro, date of birth December 14, 19XX (redacted), and ANDREW LYNCH, date of birth October 5, 19XX (redacted).

FEDERAL SEARCH WARRANT

58. Based on the investigation as detailed herein, on July 11, 2018, a United States Magistrate Judge in the Middle District of Florida signed a warrant authorizing the search of 6232 West La Prima Court, Crystal River, Florida 34429, the residence associated with ANDREW LYNCH and John Caro. On July 18, 2018, the FBI executed the warrant. My colleague and I were present for the search and interviewed LYNCH while Agents assigned to the FBI in Ocala, Florida, spoke to his brother Anthony Caro.

59. As mentioned above, Caro was interviewed by the FBI during the warrant’s execution. During the interview, Caro said that for the past four years he has resided at 6232 West La Prima Court, Crystal River, Florida 34429, with LYNCH. Over a year earlier,

Caro's ex-girlfriend lived there as well. Caro said he worked the night shift in the medical field and he knew the residence's WiFi required a password.

60. During the warrant's execution, my colleague and I interviewed LYNCH. LYNCH said he lived at 6232 West La Prima Court with his half-brother, Anthony Caro. His other half-brother, John Caro, formerly resided there until fall 2017. LYNCH also said the home's WiFi was password protected, though could not recall the password; he advised he has provided the password to friends on occasion. LYNCH said his current cell phone was about six months old. LYNCH recalled speaking to a Detective from the Citrus County (Florida) Sheriff's Office (CCSO) in June 2018. After the June 2018 CCSO interview, LYNCH spoke to his friend, hereinafter Witness 1, who said the same Detective contacted him as well. Witness 1 told LYNCH that LYNCH and/or Caro were being investigated by the CCSO for communicating with underage girls. I then showed LYNCH several messages from gregory.oneil.752 and he denied recognizing them. I asked LYNCH about (352) 350-5064 and email accounts runcool@mail.com and lynn21@mail.com. LYNCH said he did not recognize any of them. I then showed LYNCH the subpoena return for (352) 350-5064, which was registered in his name. He replied, "[n]ot my number." He was confident Caro would not have obtained a phone number in LYNCH's name. LYNCH then asked if he could terminate the interview and I advised he could stop answering questions or depart anytime. Soon thereafter, LYNCH terminated the interview.

61. Soon thereafter, I was approached by Sandra Lynch and Anthony Caro,

ANDREW LYNCH's mother and half-brother, who advised that Anthony Caro works as a radiologist technician at a large hospital in Tampa. They explained that Caro works from 7:00 pm – 7:00 am on Friday, Saturday, and Sunday nights. Caro said he needs to leave for work no later than 5:30 pm. I learned from the search team that LYNCH promptly identified which phone was his, and that the number associated with this phone was (352) 610-3128. LYNCH, Anthony Caro, and Sandra Lynch were all adamant that neither LYNCH nor Anthony Caro ever engaged in the behavior described herein and did not operate gregory.oneil.752.

62. Later on the same day, my colleague and I met Witness 1 who recalled speaking to the aforementioned CCSO Detective in early June 2018. Witness 1 told us the CCSO Detective showed him a few pictures that were sent from the IP address at 6232 West La Prima Court to communicate with minors. None of the images CCSO showed him were the same as discussed herein. Witness 1 recognized a few of the CCSO-provided pictures as being of him. Witness 1 said those images were obtained by someone from Witness 1's Facebook page. The pictures the CCSO Detective showed Witness 1 were of him when he was 15 or 16 years old, before he got his tattoos. After his conversation with the Detective, Witness 1 changed his Facebook settings to ensure only Facebook friends could see his pictures. About the same time, LYNCH deleted his Facebook page, got a new phone, and a new phone number. LYNCH told Witness 1 he did so because of the Facebook data breach, referring to the CCSO investigation, but Witness 1 suspected it was related to the CCSO Detective's investigation. Witness 1 said he and LYNCH were long term friends but had a dispute around

February 2018. They did not speak again until the CCSO Detective interviewed both. After the Detective's interview with Witness 1, he called LYNCH to discuss the situation and heard LYNCH's mother in background say, “[w]hat, you in trouble for child porn?” Witness 1 was surprised and upset — he felt like he was now under law enforcement scrutiny without having done anything to warrant it. I then showed Witness 1 some of the non-nude images sent from gregory.oneil.752, purportedly of the account's user, and he did not recognize the images. After the FBI departed the residence, Witness 1 spoke to LYNCH's sister who said LYNCH was upset and throwing up; he was scared he would go to jail for something he did not do.

INVESTIGATION OF PHONES/ADDITIONAL RECORDS

63. The FBI later assessed that Anthony Caro used the Facebook page anthony.caro.1042, based on its content and friends, including one who works in the same radiology department at the same hospital. Pursuant to a subpoena, Facebook advised anthony.caro.1042 was associated with telephone number (813) 455-7837. Facebook also advised that the number was “verified,” meaning they communicated with the user of anthony.caro.1042 over (813) 455-7837. T-Mobile advised that telephone number (813) 455-7837 does not have any subscriber details associated with it. I noticed that some of the these subject gregory.oniel.752 Facebook Messenger chat sessions took place during time periods that Caro would have been at work in Tampa, about 60 miles away from his residence.

64. Based on records obtained by subpoena, I learned that telephone number (352) 610-3128 was subscribed to by LYNCH, and that he obtained the number on May 3, 2018.

65. On July 24, 2018, a US Magistrate Judge in the Western District of New York signed a warrant authorizing the FBI to obtain from T-Mobile cellular site data associated with both LYNCH's and Caro's cellular telephones: (352) 610-3128 and (813) 455-7837, respectively. The purpose of obtaining cellular site data associated with both phones was to match cell tower locations up with specific chat sessions from gregory.oneil.752.

66. On August 7, 2018, the United States Attorney's Office in Buffalo issued a Grand Jury subpoena to St. Joseph's Hospital in Tampa, Florida requesting Caro's employment schedule from April 2018 – July 2018. On August 6, 2018, the FBI received the requested records, which showed specific "clock in" and "clock out" times.

67. In February 2019, forensic reports pertaining to media seized pursuant to the federal search warrant at LYNCH's residence were made available by the Western New York Regional Computer Forensics Laboratory (RCFL). The report pertained to multiple external hard drives and other pieces of digital media not searched at the field office due to the RCFL's greater capability. Images were recovered from known child pornography hash sets; that is, the images recovered were not child pornography, but were part of a series that did contain child pornography. Most importantly, nothing related to Facebook account gregory.oneil.752 was recovered.

68. In December 2019 and January 2020, two separate Court Orders were issued to Facebook pursuant to Title 18, United States Code 2703(d). The purpose of the orders was

to identify which machine cookies were associated with gregory.oneil.752 and other Facebook accounts liked by the same machine cookie. The orders did not provide necessary evidence.

69. In February 2020, I asked my colleague, FBI Staff Operations Specialist (SOS) Kimberly Smith to analyze more thoroughly the gregory.oneil.752 chats, specifically where the Production of Child Pornography and/or Sextortion took place, and compare those conversations to when Caro was known to be located at St. John's Hospital in Tampa (based on his subpoenaed employment records). The subsequent paragraphs were developed from SOS Smith's findings.

70. On or about May 5, 2018, at 01:42:09 UTC, from the target IP address at the LYNCH/Caro residence, LYNCH used gregory.oneil.752 demanded Victim 5 send him illicit pictures. At 01:54:56 UTC, LYNCH demanded Victim 5 send a video of herself putting a hairbrush in her anus. When Victim 5 refused, at 01:57:37 UTC, LYNCH told her, "I'd video chat and play with that pussy and show that body or I post." The employment records show that Caro was at the hospital from 22:54 UTC on May 4, 2018 until 11:37 UTC on May 5, 2018. The conversation with Victim 5 began over two-and-a-half hours after Caro clocked into the hospital.

71. On or about May 13, 2018, LYNCH wrote Victim 5 "[d]ude I'm going to post." The following day, he wrote Victim 5 "[y]ou better answer/Hey/Fine/I'll post." At 05:00:43

UTC on May 14, 2018, from the target IP address at the LYNCH/Caro residence, LYNCH sent a previously obtained nude image (that showed her face) of Victim 5 back to her. He wrote, "I will post to your friends." At 05:11:08 UTC, LYNCH wrote "close up picture of your pussy." At 05:11:29 UTC, Victim 5 sent a close up image of her vagina. The employment records show that Caro was at the hospital from 23:00 UTC on May 13, 2018 until 11:30 UTC on May 14, 2018. The threat to post, demanding a nude image, and Victim 5 ultimately sending one, took place while Caro was in the middle of his shift at the hospital.

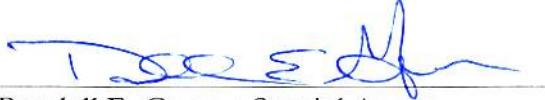
72. On or about May 12, 2018, beginning at 08:39:47 UTC, LYNCH, using the gregory.oneil.752 Facebook account, sent a photo of a penis from the target IP address at the LYNCH/Caro residence to a Facebook user who then identified herself as a 17 year old girl. At 09:15:45 UTC, the minor sent a picture, purportedly of herself, wearing a black bra, exposing her vagina (her face was not in the image). LYNCH replied "[o]k I will post to all your friends if you don't do as I ask...naked body with face in picture." The girl indicated she was afraid LYNCH would share the image with her brother and resisted sending a nude with her face in the picture. At 09:24:30 UTC, LYNCH sent back to the minor the nude image she sent him; he wrote, "I will show your brother." The employment records show that Caro was at the hospital from 23:30 UTC on May 11, 2018 until 11:25 UTC on May 12, 2018. The conversation with this minor began about two-and-a-half hours before the end of Caro's shift.

73. On or about May 12, 2018, LYNCH, using the gregory.oneil.752 Facebook

account, began a Facebook Messenger conversation with a user who identified herself as a 15 year old girl. At 20:03:08 UTC, this minor sent a picture of her exposed breasts to LYNCH. Several hours later, at 00:50:45 UTC, from the LYNCH/Caro residence target IP address, LYNCH sent a screenshot of one of the minor's Facebook friends profiles and wrote "let's see what he thinks/or you can let me see." The minor told him to stop and LYNCH wrote "then let me see." The minor sent a close up picture of her vagina at 00:59:35 UTC. The employment records show that Caro was at the hospital from 23:10 UTC on May 12, 2018 until 11:42 UTC on May 13, 2018. The conversation with this minor began about two and a half hours before the end of Caro's shift. When LYNCH sent the screen shot of the minor's Facebook friend, which led to her producing child pornography, Caro had been at work for one hour and forty minutes.

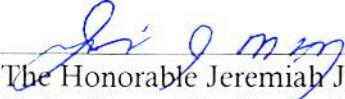
III. CONCLUSION

74. Based upon the above information, I assert that probable cause exists to believe that ANDREW LYNCH violated Title 18, United States Code, Sections, 2251, 2261A(2)(B), and 2422(b) [Production of Child Pornography, Cyberstalking, and Attempted Enticement].



Randall E. Garver, Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me
this 9th day of March 2020



The Honorable Jeremiah J. McCarthy
United States Magistrate Judge